

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Sunday
and Holiday Collections

Docket No. C2001-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
IN OPPOSITION TO THE POPKIN MOTION TO COMPEL REGARDING
DBP/USPS-13(g), 14, and 16
(July 18, 2001)

On July 13, 2001, David Popkin filed a motion to compel responses to the above items. The Postal Service hereby opposes that motion.

With respect to item 13(g), Mr. Popkin is seeking essentially the same type of consolidation information sought by Mr. Carlson in his motion to compel a response to DFC/USPS-50. The Postal Service is today filing its more extensive response in opposition to Mr. Carlson's motion to compel, and that opposition is hereby incorporated by reference. Both Mr. Carlson and Mr. Popkin explain why, in the context of a facility-specific analysis, information on consolidation practices would potentially improve the sophistication of the analysis. Neither, however, adequately explains why a more sophisticated facility-specific analysis is necessary in view of the availability of national level data that allows avoidance of several pitfalls of a facility-specific analysis. Given the information already available, the further information requested would not be material.

Mr. Popkin's request differs in that, in contrast with Mr. Carlson's pursuit of information from 2000 and 2001, Mr. Popkin is seeking information going back as far as 1992. The problems with this are twofold. First, it would be even more unduly

burdensome to have to produce information for 10 years, as opposed to 2 years. Simply stated, Mr. Carlson seeks information relating to hundreds of facilities for 15 holidays; Mr. Popkin seeks the same information relating to the same number of facilities for 95 holidays. The substantial increase in the associated burden is self-evident.

Second, information going back that far in time would likely become more difficult to obtain, and much more susceptible to gaps. Without *comprehensive* information on consolidation, it is not clear what possibly would be gained by attempting to improve the analysis in this fashion. Moreover, trying to be responsive to a request going back that far in time could lead to a lot of wasted effort -- time spent attempting to find information that, ultimately, may simply be determined no longer to exist.

With respect to questions 14 and 16, Mr. Popkin continues his crusade to shift the focus of this proceeding to the POM. In its compelled response to DBP/USPS-2, the Postal Service explained the current procedure, and how that procedure relates to the POM. All relevant facts have been provided. Mr. Popkin at this point appears to be more interested in arguing than in obtaining useful information.

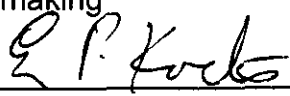
Therefore, Mr. Popkin's motion to compel responses to items 13(g), 14, and 16 should be denied.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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July 18, 2001

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

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